

FILED

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

2012 APR 13 P 4: 36

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

JOSEPH R. WILSON

Plaintiff

v.

PRECIOUS PRINCESS PRODUCTIONS, LLC,

D & D ENTERTAINMENT, LLC, and

AMRESORTS, L.P.,

Defendants.

Case No. 1:12 cv 410
GBL/TRJ

COMPLAINT FOR TORTIOUS INTERFERENCE
WITH CONTRACTUAL RELATIONSHIP

Plaintiff, Joseph R. Wilson, by Counsel, moves the Court for judgment against Defendants upon the grounds as hereinafter set forth:

- 1) Jurisdiction of this court is conferred by 28 U.S.C. § 1332 in that there is complete diversity of citizenship and the amount in controversy exceeds \$75,000.
- 2) Plaintiff is a citizen of the Commonwealth of Virginia.
- 3) Defendant Precious Princess Promotions, LLC is a Missouri limited liability corporation.
- 4) Defendant D & D Entertainment, LLC is also a Missouri limited liability corporation.

5) Defendant AMResorts, L.P. is a limited partnership organized under the laws of the Commonwealth of Pennsylvania.

6) On April 28, 2008, Plaintiff entered into a written contract with a performing artist, Mike A. Walker, to serve as Walker's sole and exclusive personal manager in exchange for certain consideration.

7) On information and belief, since August, 2009, Defendant Precious Princess Promotions, LLC, while aware of the contractual relationship between Plaintiff and Mike A. Walker, has served as Walker's *de facto* manager and collected and misappropriated compensation due and owing to Plaintiff without Plaintiff's consent.

8) On information and belief, Defendant D & D Entertainment, LLC, while also aware of the contractual relationship between Plaintiff and Mike A. Walker, has promoted and booked shows for Walker and collected and distributed funds rightfully belonging to Plaintiff to Defendant Precious Princess Promotions, LLC and/or Mike A. Walker without Plaintiff's consent.

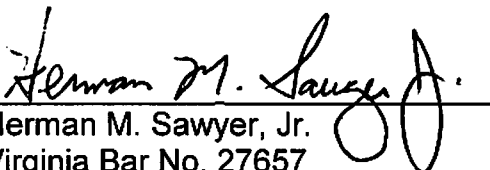
9) On information and belief, Defendant AMResorts, L.P., while also aware of the contractual relationship between Plaintiff and Mike A. Walker, has provided venues for Walker's shows and collected and distributed funds rightfully belonging to Plaintiff to Defendant D & D Entertainment, LLC, Defendant Precious Princess Promotions, LLC and/or Mike A. Walker without Plaintiff's consent.

10) As a result of Defendants' intentional interference with Plaintiff's contractual relationship, Plaintiff has suffered and will continue to suffer economic damages.

WHEREFORE Plaintiff demands judgment against Defendants in an amount of \$250,000, and for his costs expended herein.

Respectfully submitted,

JOSEPH R. WILSON
By Counsel


Herman M. Sawyer, Jr.
Virginia Bar No. 27657
Attorney for Joseph R. Wilson
Law Offices of Herman M. Sawyer, Jr.
205 E. Broad St.
Falls Church, VA 22046
Phone: (703) 533-3500
Fax.: (703) 533-2361
sawlaw@cox.net